

EXHIBIT E

From: [Pace, Chris](#)
To: [Stancil, Paul](#); [Isaak, David](#)
Cc: [Ram, Ashwin](#); [Stewart, Shontel](#); [Saathoff, Austin E.](#)
Subject: [EXTERNAL] NFN8: Revised proposal on expedited discovery following Meet and Confer
Date: Thursday, October 24, 2024 1:28:07 PM
Attachments: [image002.png](#)
[image004.png](#)
[NFN8 - Defendants" Revised Proposals for Expedited Discovery - 2024.10.24.pdf](#)

Paul and David, attached is a revised proposal that reflects financial data for all of 2024 versus just the current balance sheets, P&Ls and bank statements. This is in response to one of the concerns you raised during the meet and confer. Thanks, Chris

Christopher R.J. Pace

Partner

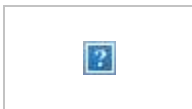
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From: Pace, Chris
Sent: Wednesday, October 23, 2024 1:09 AM
To: 'Stancil, Paul' <pstancil@steptoe.com>; Isaak, David <disaak@steptoe.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <[sstewart@steptoe.com](mailto:ssstewart@steptoe.com)>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: NFN8: Meet and Confer

Per our meet and confer yesterday (Tuesday) afternoon and per your request, please see the attached written proposal on expedited discovery. Thanks, Chris

From: Stancil, Paul <pstancil@steptoe.com>
Sent: Tuesday, October 22, 2024 3:34 PM
To: Pace, Chris <CRJPace@winston.com>; Isaak, David <disaak@steptoe.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <[sstewart@steptoe.com](mailto:ssstewart@steptoe.com)>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: RE: NFN8: Meet and Confer

Chris: We're checking availability on our end and will try to make it work; I'll get back to you as soon as I can with either a definitive "yes" or a different proposal.

From: Pace, Chris <CRJPace@winston.com>
Sent: Tuesday, October 22, 2024 3:12 PM
To: Isaak, David <disaak@steptoe.com>; Stancil, Paul <pstancil@steptoe.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: [EXTERNAL] NFN8: Meet and Confer

Can we talk at 4:30 Central today? I will be out of the office, but I can dial in remotely. Otherwise, I am flexible tomorrow morning. Thanks, Chris

Christopher R.J. Pace

Partner

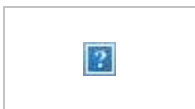
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From: Isaak, David <disaak@steptoe.com>
Sent: Tuesday, October 22, 2024 8:01 AM
To: Pace, Chris <CRJPace@winston.com>; Stancil, Paul <pstancil@steptoe.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: Re: Meet and Confer

I could rearrange some things and be available this afternoon. I would prefer to do this today to keep things moving and because tomorrow is not great for me.

From: Pace, Chris <CRJPace@winston.com>
Sent: Tuesday, October 22, 2024 2:33:21 AM
To: 'Isaak, David' <disaak@steptoe.com>; Stancil, Paul <pstancil@steptoe.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: [EXTERNAL] RE: Meet and Confer

Apologies for the delay; I was caught up on another matter.

We are meeting with our clients today (Tuesday). We can schedule a meet and confer for Wednesday morning, or possibly Tuesday afternoon depending on the timing of our client call.

Thanks
Chris

From: Isaak, David <disaak@steptoe.com>
Sent: Monday, October 21, 2024 8:04 PM
To: Stancil, Paul <pstancil@steptoe.com>; Pace, Chris <CRJPace@winston.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; Saathoff, Austin E. <ASaathoff@winston.com>
Subject: RE: Meet and Confer

Chris/Austin,

In advance of our next meet and confer, please see the attached revised list of information discovery requests. Please let us know if 11 am central will work for you for a conference. Otherwise, Paul and I are available any time before 930 or between 11 and 130.

Best regards,

David

From: Isaak, David
Sent: Monday, October 21, 2024 6:01 PM
To: Stancil, Paul <pstancil@steptoe.com>; Pace, Chris <CRJPace@winston.com>
Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>; asaathoff@winston.com
Subject: RE: Meet and Confer

Chris/Austin,

Just following up on this. It would be good to get this on the calendar for tomorrow. Thanks.

From: Stancil, Paul <pstancil@steptoe.com>

Sent: Monday, October 21, 2024 2:34 PM

To: Pace, Chris <CRJPace@winston.com>

Cc: Ram, Ashwin <aram@steptoe.com>; Stewart, Shontel <sstewart@steptoe.com>;
asaathoff@winston.com; Isaak, David <disaak@steptoe.com>

Subject: Meet and Confer

Counsel: In light of the Court's ruling during today's status conference and both sides' stated desire to move the ball forward on this matter quickly, Plaintiffs propose that we meet and confer to determine whether the parties can agree to the scope of expedited discovery at 11:00 AM CT tomorrow. Please advise.

Thanks,
Paul

Paul Stancil
Of Counsel



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Defendants' Revised Proposal for Expedited Discovery—October 24, 2024

I. Documents to be provided by Defendants:

- A. Miners:** A spreadsheet compiling the following information for all miners under the control of one or more of the NFN8 entities:
 - 1. Brand;
 - 2. Model;
 - 3. Serial Number;
 - 4. Purchase price (or average purchase price if acquired in a bulk purchase);
 - 5. Unit ownership status; and
 - 6. Algorithm.
- B. Financial statements:**
 - 1. Consolidated balance sheets and consolidated profit-and-loss statements for NFN8 Group and its affiliates for 2024 on a monthly basis.
 - 2. Balance sheets and profit-and-loss statements for the other NFN8 entities for 2024 to the extent those are maintained (on either a monthly or quarterly basis, as maintained for each entity).
- C. Bank statements:** Copies of the monthly bank statements available for each of the NFN8 entities that has a bank account for 2024.
- D. Debts and other amounts owed:** Documentation for any outstanding loans or credit agreements of an NFN8 entity.
- E. Entity ownership:** Identification of current owners and their respective ownership percentages for each of the NFN8 entities.
- F. Accountants:** Identification of third-party accounting firm for the NFN8 entities.
- G. Hosting facilities and locations associated with cryptocurrency mining operations:**
 - 1. Identification of each facility at which cryptocurrency mining systems are operating.

2. As to each facility that is a third-party hosting location:
 - i. The physical address;
 - ii. The hosting charge (which covers the cost of electricity and the cost of the physical location); and
 - iii. The hosting entity.
3. As to each facility that is owned or leased by a NFN8 entity:
 - i. The physical address;
 - ii. The average or fixed cost for electricity paid by a NFN8 entity;
 - iii. The electricity provider;
 - iv. The lease cost; and
 - v. The lessor.
4. Applicable hosting agreement, leasing agreement and/or electricity provider agreement for each facility at which cryptocurrency mining systems are operating.

II. Documents to be provided by Plaintiffs:

Financial statements: Most current balance sheets and profit-and-loss statements for the Plaintiff entities.

III. Depositions:

- A. **Plaintiffs may take one deposition not to exceed three hours.**
 - Deponent would be of either Joshua Moore or Cory Rodriguez, as selected by Defendants.
 - Parties are discussing possibility of deposition being in the form of a Rule 30(b)(6) corporate representative deposition.
- B. **Defendants may take one deposition not to exceed two or three hours.**
 - We need to discuss with our clients accepting a deposition shorter than the deposition Plaintiffs will be taking.
 - Deponent would be Dr. Lo.
 - We are also willing to discuss the possibility of this deposition being in the form of a Rule 30(b)(6) corporate representative deposition.